



Willimantic River Alliance, Inc.

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BUREAU OF WATER PROTECTION AND LAND REUSE
PLANNING & STANDARDS DIVISION
FEB 03 2010

January 31, 2010

Paul Stacey
Department of Environmental Protection
Bureau of Water Protection and Land Reuse
Planning and Standards Division
79 Elm St.
Hartford, CT 06106-5127

SUBJECT: Comments on Proposed Stream Flow Regulations

Dear Mr. Stacey,

The Willimantic River Alliance strongly supports the proposed Connecticut Stream Flow Standards and Regulations. Having witnessed the drying up of the Fenton River firsthand, we do not want to see a repeat of that impairment on the Willimantic or any other river in Connecticut. We have some suggestions for changes that may improve the effectiveness of the specific regulations:

Under the proposed regulations, rivers are to be divided into multiple segments. The classification of each segment would be determined by a factor that impacts the river, such as a dam. Another type of influential factor is the recreational or natural function of the river, such as a DEP Trout Management Area or a stream with a significant population of native fish. These items should be included as Unique Factors in the process of classifying segments of a river or stream.

Certain activities would be exempt from the proposed regulations, such as "diversions pursuant to a current diversion permit." Would those who have such a permit (and are thus exempt) be required to participate and comply with a collective impact assessment after 10 years? This issue needs to be clarified. We see the importance of managing a river/watershed resource as a unified entity, not as a succession of diversions and dams to be regulated in isolation. Only a watershed-wide perspective and oversight will ensure effective protection for Connecticut's water resources. The "collective maximum alteration of stream flow" is an important standard to protect a river from harmful independent actions, and we urge that it be applied to entities with current permits and flow management plan agreements, as well to those who will be required to create new water supply plans.

The Willimantic River Alliance has worked since 1995 to protect the Willimantic River and to promote its enjoyment. We appreciate past DEP efforts to protect the river, and we support these proposed regulations and standards as an important tool to maintain its health. The river has made a great come-back from its polluted state, and with these tools it can remain a valued resource for aquatic life as well as a water supply resource and for enjoyment by many paddlers, fishermen and park visitors.

Sincerely,

Meg Reich, Vice President,
Willimantic River Alliance